

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
DAYTON DIVISION**

IN RE:

CASE NO. 15-32242

**JEFFREY S. ROSE
STEPHANIE L. ROSE**

CHAPTER 13

Debtors

JUDGE GUY R. HUMPHREY

RESPONSE BY CREDITOR TO MOTION TO COMPEL [D.E. 87]

Comes now, U.S. Bank National Association, not individually but solely as Trustee for BlueWater Investment Trust 2018-1 (“Secured Creditor”), by and through the undersigned counsel, and files this written response to Motion To Compel [D.E. 87], and as grounds therefore states:

1. U.S. Bank National Association, not individually but solely as Trustee for BlueWater Investment Trust 2018-1 is a secured creditor holding a secured claim against the Debtor’s real property, located at 10298 Greenbush Road, Camden, OH 45311.
2. On February 18, 2021, the Debtor filed a Motion to Compel [D.E. 87].
3. Secured Creditor is in the process of reviewing its records in order to respond to the allegations in this instant Motion and requests additional time to do so.
4. Secured Creditor reserves the right to supplement its response.

WHEREFORE, PREMISES CONSIDERED, Movant prays that this Court deny the Motion to Compel [D.E. 87] and that the Court grant such other and further relief as is proper and just.

DATED this 10th day of March, 2021.

Respectfully submitted,

/S/ Seth Greenhill

SETH GREENHILL, ESQ.
Ohio Bar # 99380
PADGETT LAW GROUP
6267 Old Water Oak Road, Suite 203
Tallahassee, FL 32312
(850) 422-2520 (telephone)
(850) 422-2567 (facsimile)
Seth.Greenhill@padgettlawgroup.com
Attorney for Creditor

SERVICE LIST (CASE NO. 15-32242)

VIA US FIRST CLASS MAIL:

Debtor
Jeffrey S Rose
10298 Greenbush Rd
Camden, OH 45311

Joint Debtor
Stephanie L Rose
10298 Greenbush Rd
Camden, OH 45311

VIA ECF:

Attorney for Debtors
Michael G Weller
2121 Miamisburg-Centerville Rd
Centerville, OH 45459-3725

Trustee
John G. Jansing
Chapter 13 Trustee
131 North Ludlow St, Suite 900
Dayton, OH 45402

U.S. Trustee
Asst US Trustee (Day)
Office of the US Trustee
170 North High Street
Suite 200
Columbus, OH 43215-2417